

**CITY OF PATERSON
DEPARTMENT OF LAW**

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July 10, 2025

Hon. André M. Espinosa, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King, Jr. Federal Courthouse
50 Walnut Street
Newark, NJ 07101

Via ECF

Re: United States of America v. City of Newark et. al.,
Civ. No. 2:25-cv-5081 (EP)(AME)

Dear Judge Espinosa:

I represent Defendants named as: City of Paterson, Paterson City Council, Alex Mendez, Paterson City Council President, in his official capacity, and André Sayegh, Mayor of Paterson, in his official capacity, collectively referred to herein as "Paterson Defendants." I am writing with the consent of opposing counsel to request a sixty (60) day extension of time to for the Paterson Defendants to respond to the Complaint. The Complaint pertains to serious matters that require additional time to investigate, obtain materials, and formulate a response. As such, additional time is needed to evaluate the complaint and prepare a response. Further, the request poses no prejudice to the Plaintiff, and opposing counsel has graciously agreed to the extension. The Paterson Defendants hereby preserve and explicitly reserve all rights, defenses, claims, and remedies.

We thank the Court for its time and attention to this matter.

Very truly yours,
s/Aymen A. Aboushi,
AYMEN A. ABOUSHI
CORPORATION COUNSEL